

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

PETITION FOR WAIVER OF LOCAL NUMBER PORTABILITY
IMPLEMENTATION DEADLINE

The Southern New England Telephone Company ("SNET") hereby requests a waiver of the June 30, 1998 Phase III implementation deadline for local number portability ("LNP"). The Commission's First Memorandum Opinion and Order on Reconsideration requires that a carrier which is unable to meet the deadline for implementing an LNP method "may file with the Commission, at least 60 days in advance of the deadline, a petition to extend the time by which implementation in its network will be completed."¹ With this Petition, SNET seeks an extension of the June 30, 1998 deadline for one central office located in the Hartford Metropolitan Statistical Area ("MSA").

SNET is fully committed to meeting the Commission's LNP requirements and has made every effort to see that LNP is implemented in Connecticut in full compliance with the Commission's rules. LNP implementation for thirty-three of the thirty-four host switches in the Hartford MSA is underway and on target for completion by the June 30,

¹ In the Matter of Telephone Number Portability, CC Docket No. 95-116, First Report & Order, 111 FCC Rcd 8393 (Order). The Commission's LNP implementation schedule requires that a long-term LNP method be implemented in the Hartford, CT MSA by June 30, 1998. This Petition is being filed at least 60 days in advance of that deadline and is, therefore, timely filed.

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1998 deadline. However, due to circumstances beyond its control, SNET requests an extension of the implementation deadline for one host switch in the Hartford MSA, its New Britain central office, from June 30, 1998 to December 12, 1998. Modernization efforts are underway in the New Britain central office for two reasons; first, it is being upgraded from a 1A ESS switch to a digital 5ESS switch. Second, it is being upgraded to serve as one of a pair of 911 tandems needed to support a new digital 911 emergency reporting system in the State of Connecticut. The extension of time for the implementation of LNP in this switch is needed in order for SNET to complete these modernization efforts. SNET proposes that the New Britain central office be made LNP capable coincident with the effective date of the switch modernization, December 12, 1998.

Sequence of Modernization Efforts

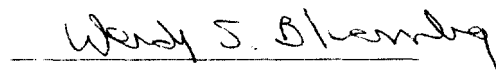
In order to upgrade the New Britain switch to a 911 tandem, SNET will need until the end of October to complete this upgrade. First, the Public Safety Answering Points (PSAPs) need to be upgraded with digital technology. The PSAP Customer Premises Equipment (CPE) deliverables have been delayed due to vendor development delays in this “first of a kind” application. This has resulted in a delay in the completion of the New Britain PSAPs. SNET anticipates that the upgrade of the New Britain PSAPs will be completed by September 11, 1998.

Second, it is necessary for SNET to conduct extensive E911 network testing. This testing requires five weeks to complete and, therefore, would not be finished until October 16, 1998. In addition, the New Britain 911 flash cut is currently scheduled to occur on October 21, 1998.

Following the completion of the 911 upgrade, work will begin to modernize the switch from a 1A ESS to a digital 5ESS. First, updates to the switch are frozen to allow translation activity to occur to move analog lines to the 5ESS switch. This work activity requires a six-week interval from the October 21st date for completion. Completion of the New Britain central office modernization is scheduled for effect December 12, 1998.

Therefore, SNET respectfully requests a waiver of the June 30, 1998 LNP implementation deadline for the New Britain central office to allow SNET to implement LNP for this central office coincident with the effective date of the modernization, December 12, 1998.

Respectfully submitted,

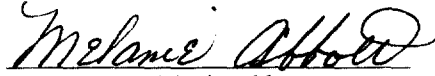
A handwritten signature in dark ink, reading "Wendy S. Bluemling", is written over a horizontal line.

Wendy S. Bluemling
Director - Regulatory Affairs & Public Policy
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April 30, 1998

CERTIFICATE OF SERVICE

I, Melanie Abbott, hereby certify that on this 30th day of April, 1998, a true copy of the foregoing Petition of SNET was sent via first class mail, postage prepaid or hand delivered to each of the parties listed below:


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